

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Mingfei Zhu

Plaintiff,

v.

The Partnerships and Unincorporated
Associations Identified in
Schedule "A",

Defendants.

Case No.: 24-cv-01139

Judge: Hon. Virginia M. Kendall

Magistrate: Hon. Beth W. Jantz

**PLAINTIFF'S *EX PARTE* MOTION TO EXTEND TEMPORARY
RESTRAINING ORDER FOR GOOD CAUSE**

Plaintiff Mingfei Zhu seeks an extension to the Temporary Restraining Order entered by this Court on March 26, 2024 and would ask the Court that the TRO be extended for good cause which exists as follows:

Plaintiff has been diligent. Plaintiff has already posted the required \$10,000 Surety Bond with the Clerk and served subpoenas on all the relevant third parties. We have obtained initial responses, however, Third-Party Respondent who control the identity information of a majority of the Doe Defendants are delaying their ability to provide timely responses during the initial Temporary Restraining Order period.

Plaintiff anticipates being able to serve all the Defendants, but will not be able to do so by April 9, 2024, the day the TRO expires.

Accordingly, despite exercising diligence, due to events and actions outside the Plaintiff's control, the Plaintiff asks the Court to extend the TRO, 14 days, or until April 23, 2024 to allow Plaintiff to utilize the TRO and effectuate service of process against all of the Defendants. Plaintiff will effectuate service of process on all Defendants and file its Motion for Preliminary Injunction by, or earlier than, March 18, 2024.

Dated this April 2, 2024

Respectfully submitted,

By: /s/ Kevin Keener

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